

Application No.: 10/605,571

Docket No.: 22040-00020-US

REMARKS

Claims 1-14 are now pending in this application. Claims 1, 5-7, and 9 are independent. Claims 1 and 4-6 have been amended, and claims 7-14 have been added. No claims have been canceled by this amendment. No new matter is involved by any amendment to the Specification or Claims.

Amendment to the Specification

Various headings in the Specification have been amended for clarity.

Anticipation Rejection over Aude

Withdrawal of the rejection of claims 1, 2, and 5 under 35 U.S.C. §102(e) as being anticipated by Aude (US 6,445,250) is requested.

Applicant notes that anticipation requires the disclosure, in a prior art reference, of each and every limitation as set forth in the claims.¹ There must be no difference between the claimed invention and reference disclosure for an anticipation rejection under 35 U.S.C. §102.² To properly anticipate a claim, the reference must teach every element of the claim.³ "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference".⁴ "The identical invention must be shown in as complete detail as is contained in the ...claim."⁵ In determining anticipation, no claim limitation may be ignored.⁶

By way of background, Aude discloses transistors T15, T25, T35, and T45 in FIG. 1 arranged on one side of current source I_{BIAS} , but not collectively arranged near the current source I_{BIAS} .

¹ *Titanium Metals Corp. v. Banner*, 227 USPQ 773 (Fed. Cir. 1985).

² *Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 USPQ2d 1001 (Fed. Cir. 1991).

³ See MPEP § 2131.

⁴ *Verdegaal Bros. v. Union Oil Co. of Calif.*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

⁵ *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

⁶ *Pac-Tex, Inc. v. Amerace Corp.*, 14 USPQ2d 187 (Fed. Cir. 1990).

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In contrast, Applicants' disclosed invention shows that the plurality of transistors are connected to the *n* multistage differential amplifiers and a constant current source by a current mirror, and are collectively arranged near the constant current source. As a result, the various wiring lengths between the constant current source and the plurality of transistors is reduced to the shortest length practical, and the distributed resistance and voltage drop can be reduced to values which are as small as possible, resulting in improved noise immunity, better linearity, and improved high frequency performance.

In particular, the applied art does not disclose a multistaged amplification circuit which includes, among other features, "...a plurality of transistors connected to said *n* differential amplifiers...wherein said plurality of transistors are collectively arranged near said constant current source," as recited in independent claim 1, as amended.

Further, the applied art does not disclose a multistaged amplification circuit which includes, among other features, "...a plurality of transistors connected to a plurality of differential amplifiers...for every group...wherein said plurality of transistors are arranged collectively on the side of arranged near said constant current source for every said group," as recited in independent claim 5, as amended.

Therefore, since the applied art does not disclose each claimed limitation of independent claims 1 and 5, withdrawal of the rejection and allowance of claims 1, 2, and 5 are requested.

Unpatentability Rejection over Aude

Withdrawal of the rejection of claim 3 under 35 U.S.C. §103(a) as being unpatentable over Aude is requested.

At the outset, Applicant notes that, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, *the prior art reference must teach or suggest all the claim*

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*limitations.*⁷ Further, the teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure.⁸

Claim 3 depends upon now allowable independent claim 1, and is allowable at least on that basis, without further recourse to the additional patentable features recited therein. Allowance of claim 3 is requested.

Unpatentability Rejection over Aude in View of Ingrashi et al.

Withdrawal of the rejection of claims 4 and 6 under 35 U.S.C. §103(a) as being unpatentable over Aude in view of Ingrashi et al. (US 5,900,781) is requested. The legal standard for unpatentability has been set forth above.

Claim 4 depends upon now allowable independent claim 1, and is allowable at least on that basis, without further recourse to the additional patentable features recited therein. Allowance of claim 4 is requested. Further, the applied art does not teach or suggest that the plurality of transistors are collectively grounded to the same place via separate ground lines, as recited.

Still further, the applied art does not teach or suggest a multistaged amplification circuit which includes, among other features, "...a plurality of transistors...wherein said plurality of transistors are collectively grounded to the same place via separate ground lines," as recited in independent claim 6, as amended.

Reconsideration and allowance of claims 4 and 6 are requested.

⁷ See MPEP §2143.

⁸ *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) and See MPEP §2143.

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New Claims

New claims 7-14 have been drafted to avoid the applied art, and to claim various aspects of the invention using alternative claim language.

For example, independent claim 7 recites a multistaged amplification circuit which includes, among other features, "...a plurality of separate ground lines, wherein each of said plurality of transistors is connected to a common ground node by a dedicated one of the plurality of separate ground lines." The applied art does not teach or suggest this limitation.

Further, independent claim 9 recites a multistaged amplification circuit which includes, among other features, "...means for suppressing a ground line distributed voltage drop associated with each of the plurality of transistors." The applied art similarly does not teach or suggest such a function by any of the disclosed structure or any cooperation of disclosed structure to achieve any equivalent or similar function.

Similarly, the subject matter of new dependent claims 8 and 10-14 is not taught or suggested by the applied art.

Consideration and allowance of claims 1-14 are requested.

Conclusion

In view of the above amendment, applicant believes that each of pending claims 1-14 in this application is in condition for allowance.

In the event that the Examiner believes an interview would be helpful in resolving any outstanding issues in this case, the undersigned attorney is available at the telephone number indicated below.

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For any fee that is due, including fees for excess claims, please charge CBLH Deposit Account No. 22-0185, under Order No. 22040-00020-US from which the undersigned is authorized to draw.

Respectfully submitted,

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